

TABAK, MELLUSI & SHISHA LLP

**29 BROADWAY
SUITE 2311
NEW YORK, NEW YORK 10006**

RALPH J. MELLUSI
JACOB SHISHA*

*ALSO ADMITTED IN
NEW JERSEY

TEL (212) 962-1590
TEL (800) 280-1590
FAX (212) 385-0920
www.sealawyers.com

OF COUNSEL
STEPHEN B. ROBERTS

February 3, 2023

VIA ECF

Honorable Paul A. Crotty
United States District Court
500 Pearl Street
New York, NY 10007

Re: In re Energetic Tank, Inc. S.D.N.Y. 1:18-cv-01359 (PAC)

Dear Judge Crotty,

We represent personal injury claimants in the above captioned, and respectfully move for an order allowing us to file documents under seal.

In response to the Court's Order of January 23, 2023 [Doc 444] directing the parties to submit evidence supporting a finding of complete diversity, we wish to submit declarations from the following claimants: Joshua Hook, Doyle Ebarb, Navin Ramdhun, Patrick Joseph, Devin Mask, Jason Luangco, Donovan Jones, Xiomara Cuevassotto, Nestor Cuevassotto, Malachi Shannon, Joseph Robbins, Karen Tolley, Mark Ligon and Ashton Molton.

The declarations contain the declarants' date of birth and therefore we move for permission file the declarations under seal only viewable by the Court and the parties, with redacted versions available for public viewing. 

We thank the Court its continued assistance.

Respectfully submitted

Jacob Shisha

Cc: All counsel via ECF

2/6/2023

The injury claimants may file their declarations under seal and will be made only viewable by the Court and the parties. SO ORDERED.

